

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Andrew Amarillo, Task Force Officer, Federal Bureau of Investigation (FBI), Newport News, Virginia, being duly sworn, state the following:

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code (U.S.C.), Section 2510(7), and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, U.S.C. Section 2516.

2. As a Task Force Officer ("TFO") with the Federal Bureau of Investigation ("FBI"), I have been assigned to the Norfolk Division, Peninsula Resident Agency, as a full-time member of the Safe Streets Peninsula Task Force ("SSPTF") since 2021. I am also assigned to the Special Investigations Division with the Newport News Police Department since 2020. I have been employed with the Newport News Police Department since 2009 and have been assigned to various specialty units whose focus is to suppress guns and drugs associated with violence. In my current assignment, I am primarily responsible for investigating complex criminal enterprises led by drug trafficking organizations and criminal street gangs, to include drug smuggling conspiracies involving the illegal importation, distribution, and possession with intent to distribute illegal narcotics, the distribution and trafficking of illegal firearms, and violent crime in aid of racketeering.

3. Your Affiant has also become familiar with and utilized a wide variety of investigative techniques, including but not limited to the development of cooperating sources, source debriefings, physical surveillance, telephone call detail record analysis, the use of pen register and trap and trace devices, and the interception of wire and electronic communications. These investigations have led to numerous arrests and convictions for violations of federal laws.

4. Based on my training, experience, and discussions with other law enforcement officers, I have probable cause to believe that ZOEY CHANDLER committed the following offense in violation of federal law: criminal contempt of the authority of the United States District Court for the Eastern District of Virginia by willful disobedience and resistance to lawful writs, process, orders, rules and decrees, in violation of 18 U.S.C. § 401(3).

**PROBABLE CAUSE IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

5. ZOEY CHANDLER, the defendant herein, is a resident of Hampton Roads Metropolitan Area in the Eastern District of Virginia.

6. The United States is investigating a double homicide that occurred on June 15, 2022, during the commercial robbery of a 7-Eleven at 1401 Kiln Creek Parkway in Newport News. Surveillance from 7-Eleven shows that a man robbed the store and murdered two employees, L.T. and P.P., during the commission of the robbery. Your affiant has uncovered evidence that CHANDLER has pertinent information about these crimes.

7. On March 3, 2025, your affiant served CHANDLER with a grand jury subpoena, which commanded her to appear on March 10, 2025, at 9:30 a.m. at the U.S. District Court located at 2400 West Avenue, Suite 100, Newport News, Virginia 23607. See Government Exhibit No. 1.

8. Your affiant located CHANDLER by surveilling a known location where your affiant had previously served her with a grand jury subpoena for testimony. Your affiant recognized CHANDLER from having previously met with her in connection with the instant investigation.

9. CHANDLER has a history of not complying with subpoenas from this Court. I previously served CHANDLER with a grand jury subpoena to testify in October 2024. She briefly

came to the courthouse, but failed to remain as directed at the Court until the judge or court officer allowed her to leave.

10. On March 3, 2025, when your affiant served CHANDLER with the instant grand jury subpoena for March 10, 2025, she was at a gas station. CHANDLER attempted to throw the subpoena on the ground and told your affiant, "Stop bothering me. You keep bothering me and it's getting on my nerves... I don't need that" (or words to that effect) when your affiant attempted to provide CHANDLER the subpoena. Your affiant removed the subpoena from the ground and placed it under her windshield wiper on her vehicle.

11. On March 10, 2025, your affiant came to the federal courthouse in Newport News and waited for several hours. CHANDLER did not appear as directed on that day.

12. Following grand jury on March 10, 2025, your affiant investigated why CHANDLER did not comply with a lawful subpoena from this Court. I uncovered no valid excuse or extenuating circumstance to justify CHANDLER's failure to comply with the subpoena.

13. In recent weeks, I have observed CHANDLER post to her public social media account. On March 18, 2025, I viewed CHANDLER's Facebook page, account name: "Smokeyland Hitta" and observed a story post, which is typically visible for approximately 24 hours. The Facebook story post showed a photograph of a bottle of Hennessy advertising "\$5 shots." On April 1, 2025, I likewise observed a story post to CHANDLER's Facebook account. The story post showed a photograph collage of pictures of CHANDLER.

14. This affidavit contains only enough information to establish probable cause and does not contain all the facts or information known to members of the investigative team.

15. WHEREFORE, based upon the above information, your affiant believes probable cause exists to charge ZOEY CHANDLER with committing the following offense in violation of

federal law: criminal contempt of the authority of the United States District Court for the Eastern District of Virginia by willful disobedience and resistance to lawful writs, process, orders, rules and decrees, in violation of 18 U.S.C. § 401(3).



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Andrew Amarillo  
Task Force Officer  
Federal Bureau of Investigation

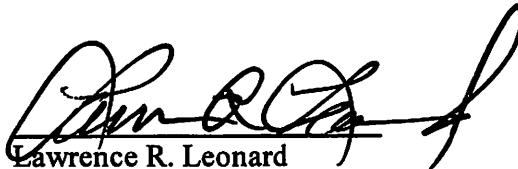
Read and approved:



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Lisa McKeel  
Mack Coleman  
Assistant United States Attorneys

Sworn and subscribed to me  
On this 7th day of April 2025



Lawrence R. Leonard  
United States Magistrate Judge  
Norfolk, Virginia

4:24G1/2022R01648-0013

## UNITED STATES DISTRICT COURT

Eastern District of Virginia

**SUBPOENA TO TESTIFY BEFORE A GRAND JURY**

**GOVERNMENT  
EXHIBIT  
1  
4:24G1**

**To:** Zoey Chandler

**YOU ARE COMMANDED** to appear in this United States District Court at the time, date, and place shown below to testify before the District Court's Federal Grand Jury. When you arrive, you must remain at the courthouse until the presiding Judge or a Court Officer allows you to leave.

<b>Place:</b> U.S. District Court 2400 West Avenue Newport News, VA 23607	<b>Date &amp; Time:</b> 3/10/2025 09:30 AM
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You must also bring with you the following documents, electronically stored information, or objects  
*(blank if not applicable):*

Please review Attachment A – Attorney Cover Letter and Attachment B – Fact Witness Instructions for additional details and guidance regarding your appearance before the Grand Jury.

**Date:** 1/31/2025**CLERK OF COURT***Signature of Clerk or Deputy Clerk*

This Subpoena was prepared and issued pursuant to the authority of the United States Attorney for the Eastern District of Virginia. The Subpoena was reviewed and approved by the following Requesting Attorney:

D. Mack Coleman

Mack Coleman, Assistant U.S. Attorney  
United States Attorney's Office  
Eastern District of Virginia – Newport News  
Division

## Subpoena to Testify Before a Grand Jury (Page 2) – AO 110 (EDVA ver. 3/6/2024)

4:24G1/2022R01648-0013

**PROOF OF SERVICE**

This Subpoena for Zoey Chandler was received by me on:

1/31/2025*Date* I served the Subpoena by delivering a copy to the named recipient as follows:Zoey Chandleron 3/3/2025 Date; or  
1045 AM I returned the Subpoena unexecuted because:

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I declare under penalty of perjury that this information is true.

Date:

3/3/2025A. Amarillo*Server's Signature*A. Amarillo, TFD*Printed Name and Title*11827 CANDON BLVD, #300, NVVA*Server's Address*

Additional information regarding attempted service, etc.:

4:24G1/2022R01648-0013

**Attachment A – Attorney Cover Letter**



U.S. Department of Justice  
**United States Attorney's Office**  
Eastern District of Virginia

Jessica D. Aber  
United States Attorney

11815 Fountain Way, Suite (757) 591-4016  
200  
Newport News, VA 23606

1/31/2025

Zoey Chandler

**Re: Federal Grand Jury Appearance**

Dear Sir or Madam:

A subpoena has been issued for your appearance as a witness before a federal grand jury in the Eastern District of Virginia (Newport News Division). It is the policy of the U.S. Department of Justice and this Office to provide the following basic information to ALL witnesses concerning their appearance before the grand jury.

Although the subpoena directs you to appear on 3/10/2025 at 9:30 a.m., the actual date and time of your appearance may be scheduled at a different time. Please call Mack Coleman, Assistant U.S. Attorney, at (757) 591-4016 to confirm the time of your actual appearance.

The grand jury consists of sixteen to twenty-three persons who inquire into federal crimes that may have been committed in this judicial District. Only authorized persons may be present in the grand jury room while evidence is being presented. This means that the only persons who may be present while testimony is being given are members of the grand jury, attorneys for the government, the witness under examination, an interpreter when needed, and for the purpose of taking evidence, a stenographer or operator of a recording device.

As a grand jury witness, you will be asked to testify and answer questions concerning possible violations of federal criminal law. The public, through the grand jury, has a right to every person's evidence, except where the privilege against self-incrimination would apply.

The mere fact that this letter is provided to a person subpoenaed to testify before a grand jury should not be taken as any implication or suggestion that the person subpoenaed is likely to be charged (indicted) with the crime under investigation.

During your appearance as a witness before a grand jury, you will be expected to answer

all questions asked of you, except to the extent that a truthful answer to a question would tend to incriminate you. An untruthful answer to any question may be the basis for prosecuting the untruthful witness for perjury. Anything that you say may be used against you by the grand jury or may later be used against you in court. You may consult your attorney before testifying; you may have your attorney outside the grand jury room, and if you desire, you will be afforded a reasonable opportunity to step outside the grand jury room to consult with your attorney before answering any question.

If you have any questions concerning the general subject matter of your appearance, or other questions, you may contact the U.S. Attorney's Office at (757) 591-4016.

Sincerely,

Jessica D. Aber  
United States Attorney

By: D. Mack Coleman  
Mack Coleman, Assistant U.S. Attorney

**Attachment B – Fact Witness Instructions**

U.S. Department of Justice  
United States Attorney's Office  
Eastern District of Virginia

**INSTRUCTIONS FOR FACT WITNESSES APPEARING ON  
BEHALF OF THE UNITED STATES GOVERNMENT  
(Not Applicable to Federal Employees)**

READ THE INFORMATION CONTAINED ON THIS FORM IMMEDIATELY. PLEASE CALL THE INDIVIDUAL LISTED BELOW FOR INFORMATION REGARDING TRAVEL ARRANGEMENTS AND SPECIFIC ENTITLEMENTS. IF YOU HAVE A MEDICAL CONDITION OR FAMILY SITUATION THAT REQUIRES SPECIAL CONSIDERATION, PLEASE ADVISE THE INDIVIDUAL LISTED BELOW AS SOON AS POSSIBLE.

**CONTACT PERSON:** - Phone:  
1-800-221 6523, ext. 3-3352

**VERIFY YOUR ATTENDANCE**

On the last business day BEFORE you travel to court, call the above number to verify that your attendance is required. This may prevent a wasted trip in the event the date is changed.

**APPEARANCE OUTSIDE THE LOCAL AREA**

If you reside outside the local area, call the individual listed above for instructions.

**REIMBURSEMENT OF EXPENSES AND ATTENDANCE FEES**

- A. **ATTENDANCE FEE:** You will be paid a fee of \$40 per day.
- B. **TRANSPORTATION:** Call the individual listed above to obtain information on transportation. Reimbursement will be made for travel by the least expensive method reasonably available to you. The following rules apply to transportation expenses:
  1. **Local Travel:** The reimbursable methods of travel to court are bus, light rail, Uber or Lyft, taxi or shuttle, and privately owned vehicles (POV).
  2. **Privately Owned Vehicles (POV):** You will be reimbursed .655 cents per mile. In addition to the above mileage allowance, necessary tolls, parking, and other fees may be reimbursed. All taxi/Uber/Lyft or parking expenses greater than \$75 must be supported by a receipt to receive reimbursement. If two or more witnesses travel in the same vehicle, only one reimbursement for mileage can be made.
3. **Common Carrier:** IF YOU RESIDE OUTSIDE THE LOCAL AREA, CALL THE INDIVIDUAL LISTED ABOVE FOR INSTRUCTIONS. It is preferable that the government make the travel/lodging arrangement for you. If you choose to purchase your own train, bus, or airline ticket you will be reimbursed at the Government rate. Reimbursement WILL NOT be made for First Class accommodations, "Frequent Flyer" tickets, or charter service. DO NOT purchase non-refundable tickets. If your appearance date changes or is canceled, you WILL

**NOT be reimbursed for non-refundable tickets. Car rentals are not reimbursable. If you have any questions concerning transportation arrangements, please contact the individual listed above. IF POV EXPENSES, INCLUDING MILEAGE, TOLLS, PARKING, AND OTHER ASSOCIATED COSTS ARE GREATER THAN THE GOVERNMENT AIRFARE, YOU WILL BE RESPONSIBLE FOR THE DIFFERENCE.**

C. **MEALS:** If it is necessary for you to remain away from home overnight, you will receive the following daily meal allowances:

**\$ 59.00 for each full day away from home    \$ 29.50 for each travel day**

D. **LODGING:** If it is necessary for you to remain away from home overnight, the Witness Coordinator listed above can arrange lodging for you. If you choose to book your own accommodations, you will be reimbursed for the ACTUAL COST of your hotel/motel room, which may not exceed specific rates set by the U.S. Attorney's Office, including tax. All incidentals (phone calls, room service, Internet, etc.) must be paid by you.

**CONCLUSION OF TESTIMONY**

When your testimony concludes, you should request information from the person listed above regarding the payment of the fees and expenses detailed on this document. The person(s) requiring your attendance will provide you with a DOJ-3 Fact Witness Voucher. You will be required to list your expenses on this voucher. The voucher will be submitted to the U.S. Marshals Service for payment. The U.S. Marshals Service will process the voucher and MAIL the payment directly to you. If you require funds to return home, notify the person listed above PRIOR to your appearance. If you receive a cash advance from your local U.S. Marshals Service, the cash advance will be deducted from your total reimbursement. The payment should arrive approximately 4-6 weeks after your appearance date.